

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TYRONE B. HENDERSON, SR.)	
KELVIN THOMAS, RONALD JOHNSON)	
and PAMELA EDWARDS,)	
<i>on behalf of themselves and</i>)	
<i>all others similarly situated,</i>)	
)	
Plaintiffs,)	Case No. 3:13-cv-00029-REP
)	
v.)	
)	
BACKGROUNDCHECKS.COM,)	
Trading as ebackgroundchecks.com)	
)	
Defendants.)	
)	

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES

COMES NOW the Plaintiffs, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and makes the following supplemental disclosures to Defendant. These initial disclosures are based on information reasonably available to Plaintiffs at this time. Plaintiffs reserve the right to supplement these disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these supplemental disclosures, Plaintiffs do not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, and this action or any other action. Plaintiffs also do not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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